

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

MAGTEN ASSET MANAGEMENT
CORPORATION AND LAW DEBENTURE
TRUST COMPANY OF NEW YORK

Plaintiffs,

$$y.$$
NORTHWESTERN CORPORATION, *et al.*

Defendant.

) Civil Action No. 04-1494-JJF
)
) Adversary No. 04-53324
)
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)
)
) Re: Docket Nos. 53, 54, 68, 69 & 71
)
)

NOTICE OF COMPLETION OF BRIEFING AND REQUEST FOR ORAL ARGUMENT

On February 1, 2006, The Plan Committee (the “Plan Committee”), successor to the Official Committee of Unsecured Creditors filed the Motion of the Plan Committee for an Order Substituting the Plan Committee for the Official Committee, or in the Alternative, to Intervene in Adversary Proceeding (the “Motion”) [Docket No. 53] together with its Motion for Expedited Consideration of Motion [Docket No. 54].

On February 13, 2006, Plaintiff Magten Asset Management Corporation and Law
Debenture Trust Company of New York filed its Objection to the Motion [Docket No. 68].

On February 14, 2006, the Defendant NorthWestern Corporation filed its Memorandum in Opposition to the Motion [Docket No. 69].

On February 21, 2006, the Committee filed its Omnibus Reply to Objections to Motion [Docket No. 71].

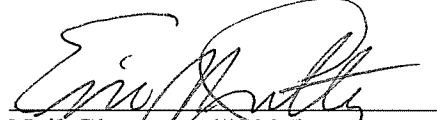
Pursuant to District Court Local Rule 7.1.2, the briefing related to the Plan Committee has been completed.

Pursuant to District Court Local Rule 7.1.4, the Plan Committee respectfully requests that oral argument be held on the Motion at the Court's earliest convenience.

Dated: February 22, 2006

THE BAYARD FIRM

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